

EXHIBIT C

IN THE CIRCUIT COURT FOR CECIL COUNTY, MARYLAND

JESSICA LITZINGER

vs

Case Number: C01-17

JOHN BRANDON EVERETT

Defendant

DEFENDANT'S ANSWERS TO INTERROGATORIES

COMES NOW the Defendant, John Brandon Everett, by and through his attorneys, Quinn, McAuliffe & Rowan and Michael J. McAuliffe, Esquire, and for his Answers to Plaintiff's Interrogatories states as follows:

INTERROGATORY NO. 1: State the names and addresses of all persons who saw or claim they saw all or any part of the occurrence, or who arrived within four (4) hours after it happened, setting forth in your answer, who of those named were witnesses, and their location at the time of the occurrence, and who arrived within the four (4) hour period

ANSWER: I am not aware of any witnesses to the occurrence. After the occurrence, a trooper from the Maryland State Police arrived on the scene. Also at the scene was a man from the house at 353 Ragan Road came out to the scene. I believe his last name was Gilbert. Also, a man in a Jeep arrived at the scene. I do not know his name.

INTERROGATORY NO. 2: State the names and addresses of the owners of the vehicle involved in the occurrence and the driver of the vehicle involved in the occurrence.

such defect, and the date and time when you first became aware of the defect, and, if the defect involved your vehicle, state what steps, if any, you took to remedy the defect either prior to or subsequent to the occurrence, and the dates thereof.

ANSWER: At this time, the defendant is without sufficient knowledge to answer this interrogatory.

INTERROGATORY NO. 21 State in substance any admission against interest or res gestae statement made by any party concerning the occurrence, injuries or losses claimed and state the names and addresses of all persons present when such statement was made.

ANSWER: I recall Jessica stating several times after the accident that she did not want an ambulance. I believe Mr. Gilbert was present when such a statement was made and I believe the police officer was also present.

INTERROGATORY NO. 22: If, on the date of the occurrence, or for five (5) years prior thereto, you had any physical or mental disability which may affect your driving ability, state the nature of the disability, the dates thereof and the name and address of any hospital, doctor or health care provider whom you consulted relative to such condition.

ANSWER: None.

INTERROGATORY NO. 23: State the names and addresses of all persons not named in answer to the foregoing interrogatories who are known to you to have personal knowledge of material facts pertaining to the cause or circumstances of the occurrence, or to

I DO SOLEMNLY SWEAR, UNDER THE PENALTIES OF PERJURY,
THAT THE MATTERS AND FACTS CONTAINED IN THE FOREGOING ANSWERS TO
INTERROGATORIES ARE TRUE AND CORRECT AS THEREIN STATED TO THE
BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF.


John Brandon Everett

Respectfully submitted,

QUINN, McAULIFFE & ROWAN

Michael J. McAuliffe, Esquire
33 Wood Lane
Rockville, MD 20850
(301) 762-1696
Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24 day of October, 2001, I
mailed, first class, postage prepaid, a copy of the foregoing Answers to Interrogatories to:

Duane A. Verderaime, Esquire
Verderaime & DuBois, P.A.
1231 North Calvert Street
Baltimore, Maryland 21202

Michael J. McAuliffe, Esquire